

europaan gelydende
dealing with

Non-Conforming / fake Fire Extinguishers

observed during servicing

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Foreword

1. The Fire Extinguisher is intended to extinguish a developing fire at its early stage
2. The Fire Extinguisher is expected to sit dormant for very long periods before instantaneous operation, usually in emergency circumstances.

For these reasons, people need to be very **confident** that the Fire Extinguisher will be ready for use, function as designed and operate safely.

This confidence is generally **obtained/driven by**

1. **Laws and regulation** for pressure risks
2. **Third party evaluation and approval** for function/fire fighting efficiency

This guideline intends to maximise people's level of confidence by focusing on these two domains.



Introduction

1. **Active protection against fire risks** is required **to safeguard human life** and goods / assets.
2. **Fire Extinguishers (FE)** are universally recognised for their significant contribution **in preventing small fires from becoming large fires which** threaten **human life** and goods / assets.
3. Existing harmonised applicable EU and national provisions/**regulation covers product conformity when it is first placed on the market; but are unable to fully address the retention of the product's conformity during its life time.** This situation is not satisfactory when it concerns first intervention fire safety means, such as fire extinguishers.
4. Periodic maintenance operations ensure that extinguishers are safe (as far as pressure risk is concerned) and that they will operate and perform as expected. During these times, **service companies will sometimes face non-conforming / fake fire extinguishers.**
5. This guideline is intended to offer stakeholders a **comprehensive tool advising how to best approach such complex situations and how to properly treat them.**
6. It also questions and suggests how these cases should be recorded and reported to improve fire protection while satisfying all applicable european and national laws.
7. This guideline is not a market surveillance instrument. It supports similar intents concerning safety and first intervention fire safety means.



Servicing companies

1. Regardless of the final seller, the servicing company will generally be the first to have the fire extinguisher in their hand after it was first placed on the market.
2. **The servicing company is responsible for guaranteeing safety and performance after service and that the the FE will be as safe and as efficient as it was supposed to be when first placed on the market.**
3. Accordingly, it is good practice that servicing companies undertake adequate controls during FE servicing so it can be confident that the FE complies with expected / claimed conformities.

classification of possible FE's deviations

1. Regarding Pressure risks

These risks are covered by EU directives (e.g. PED) and FE are submitted to EU products conformity assessment, and are accordingly mandatory **CE marked**.

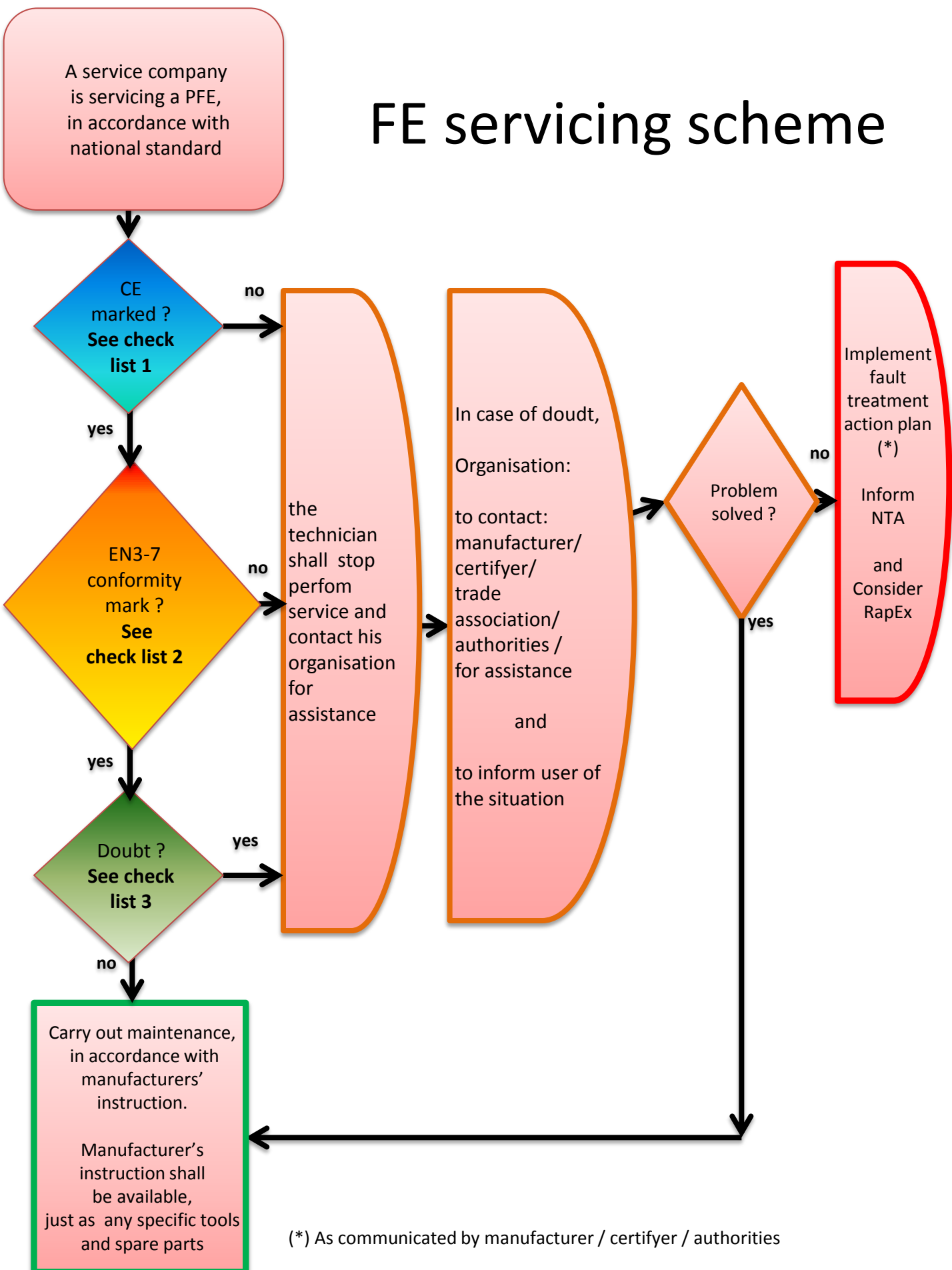


2. Function and fire-fighting efficiency

Function is covered by european EN 3-7 CEN standard. Some EU countries are regulating **EN3-7 conformity** but any fire extinguisher (or similar device) must operate and extinguish a fire as expected.



FE servicing scheme



check list 1: CE marking

- a) **CE mark** is fulfilling all PED requirements (size, shape,...)
- b) **Manufacturer** *[or its authorised representative]* can easily be identified and a way to contact him is available
- c) Manufacturing **year** of the fire extinguisher (as an assembly) is marked
- d) A valid NB Nr is appearing near the CE (see EU Nando database)
- e) **NB** is (was) PED entitled for PED manufacturing surveillance at the product manufactured date
- f) **Model** name or reference is marked
- g) Available valid **EC Declaration of conformity** (establish and **signed by the manufacturer, containing all PED requested information** and in a **language** that can be understood by the user).
- h) If the EC declaration of conformity is signed by someone other than the manufacturer, proof that **the underwriter is** validly **entitled** for this should be available.
- i) EC declaration of conformity is without doubt **linkable to the concerned product** and valid at the product manufacturing date
- j) **No recall** (either legal or voluntary) linked to pressure risks is identified on the concerned product

check list 2: EN3-7 application (either mandatory or voluntary)

- a) **EN3-7 certificate** or licence is available, without doubt **linkable to the product** and **valid at the product manufactured date**
- b) Certificate or licence is **issued by an accredited organisation** (on the corresponding period and for the scope of the purpose)
- c) Technical characteristics mentioned on the licence are **consistent with the markings on the product** (fire ratings, range of temperature , ...)
- d) All visible **EN3-7 requirements** are **obviously fulfilled**
- e) **No recall** (either legal or voluntary) linked to EN3-7 conformity is identified **on the concerned product**

check list 3:

Consistency of available information (not appearing false or creating confusion)

- a) All appearing **information** is legible and **are not counterfeit or fake** (logos or trade mark etc)
- b) appearing **information is neither conflicting nor confusing** with mandatory or voluntary info, or conflicting with intellectual property
- c) **EN3-7 requirements are not obviously transgressed**
- d) Where anything else that needs clarification is observed, the service company must be confident enough that the product is in proper working condition.

Advisory note 1:

This document is first intended to be used by FE servicing or maintenance companies, who should be aware that they have for different reasons a role to play in findings when servicing first safety means and therefore need to be prepared to handle such cases.

Advisory note 2 :

This document could also be useful to users, federation, and others stakeholders and is free to be circulated.

Advisory note 3 :

Whilst this document has been issued to cover portable FE / EN3-7, it can also certainly be applied to mobile FE / EN1866-1 with the same intent.

Advisory note 4 :

Picture and drawings in this guideline are purely illustrative.

Advisory note 5 :

Proposed check lists might be locally adjusted where needed, as long as the result of the adjustment does not hide deviations.

Advisory note 6 :

Any comment or proposed improvement of the content or the application of this guideline is welcome and should be fed back to Eurofeu PFE Section through one of its NTA members.

Bibliography

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